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February 8, 2022

Honorable Ronnie Abrams
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

**Letter Motion:
Extension of Time Request**

Re: Tijuana S. Reynolds v. Comm'r of SSA 1:21-cv-05901-RA

Dear Honorable Judge Abrams:

Pursuant to the Scheduling Order in the above referenced case, Plaintiff's motion for Judgment on the Pleadings is due on February 11, 2022. Due to the many administrative transcripts filed by the Defendant as he recovers from the pandemic backlog, Plaintiff's counsel has incurred several conflicts on the briefing calendar and requires additional time to prepare her brief in this matter. Plaintiff therefore writes to respectfully request an extension of time of sixty days (60) through and including April 12, 2022, to serve her motion, with the remaining Order to remain in effect. No previous request for an extension has been made in this case and the Defendant has given consent.

Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre
Eddy Pierre Pierre, Esq.
Attorney for Plaintiff
(646) 992-8383

Application granted.

SO ORDERED.



Hon. Ronnie Abrams
2/9/2022

(718) 504-6962 fax

Cc: Jason Peck, Esq. (Via ECF)
Attorney for Defendant.